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# Submission in respect of: Emissions Reduction Plan (ERP)

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Name of submitter: Wynyard Quarter Transport Management Association ('WQ TMA')

## 1. Wynyard Quarter Transport Management Association - background

1.1 Wynyard Quarter Transport Management Association (WQ TMA) is an independent group representing developers, landowners, employers, the marine and fishing industries, and the arts and hospitality sector which collectively have, and continue to develop an environment to work, live and play. The former industrial area is now booming with offices, housing, and a vibrant entertainment sector. The area is home to some major employers including Air New Zealand, ASB, Datacom, Fonterra, Kiwibank, Sanford, Southern Cross and has a reputation as the innovation hub for Auckland. The area currently is home to approx. 15,000 employees, and this number is set to rise. The map below shows the TMA area boundary:



- 1.2 The TMA was established under Part 14.9.3.10 (Wynyard Quarter) of the Auckland District Plan 2004. It was made a condition of the Planning Consent and Environment Court Order 2012. Trip generation ceiling targets were specified in the District Plan (DP) and are linked to the extent and timing of development permitted in Wynyard Quarter. The Resource Consent for Wynyard Quarter set a target of a 30:70 mode split by 2020. With 70% of all journeys being by sustainable modes. However, this figure has been anecdotally revised to a 20:80 or even 10:90.
- 1.3 The objectives of the TMA as outlined in the Rules are as follows:
  - to advocate to the Government, local authorities and/or persons, corporations or associations for the improvement of transport services and transport infrastructure to benefit the Wynyard Quarter community;
  - b to promote and share information with regard to access and transportation in and around Wynyard Quarter; and
  - c to do all things as are, or may be incidental to, or conducive to, the attainment of these objectives.
- 1.4 There are constraints on access to Wynyard Quarter. This has resulted in a heavy reliance on trip generation management, and restrictions have been placed on office activity under the

Auckland Unitary Plan<sup>1</sup> to ensure that vehicle traffic volumes entering and exiting the Wynyard Quarter are not increased. The mission of WQ TMA is to be the voice of the Wynyard Quarter: creating a thriving safe environment for business and community and fostering economic vitality by building partnerships, and delivering targeted transport initiatives.

1.5 WQ TMA recognise that the Wynyard Quarter area is being developed to become a unique waterfront location embracing a thriving economic hub, as well as playing host to major events (for example the America's Cup). WQ TMA understands that the regeneration and development of the area is ongoing. WQ TMA are keen to ensure that the area gets the very best transport infrastructure to support the ongoing economic growth of the area. This means well connected, reliable, and frequent sustainable transport options of high quality that ensures the safety and well-being of all users of the area.

#### 2. Comments and observations

- 2.1 WQ TMA will only be commenting on the transport sector of this report, however it is surprising to see that New Zealand's largest emissions source, agriculture (around 49%), is not expected to make any contribution to emissions reductions in the first budget period 2022-2025. After that, the regulatory framework for agricultural emissions remains uncertain. It is noted that transport is the only sector that currently has specific targets.
- 2.2 WQ TMA believe that bold and decisive actions are needed immediately if real reductions in emissions are to be achieved. Unfortunately, the ERP document indicates that developed policies are lacking in some areas. We would encourage the Government to act with urgency and to produce a detailed plan which can be implemented without further delay.
- 2.3 WQ TMA would like to see quantifiable emission targets for each sector, not just transport. These should be reviewed annually and would monitor how different sectors are tracking against their carbon reduction targets.
- 2.4 A significant budget allocation will be needed to start reducing emissions in 2022. It will then need to be supported in subsequent budgets, to ensure projects are well funded and produce the desired outcomes.
- 2.5 Consideration needs to be given to some interim targets and possible interventions. For example, if after 2 years the EV uptake and VKT reduction are not at the predicted levels, new additional new measures might need to be introduced.
- 2.6 WQ TMA support the proposed reduction in vehicle kilometers travelled (VKT) but would suggest a higher target than the proposed 20%, perhaps a 25% reduction by 2035. Given that Auckland Council has declared a Climate Emergency we believe that more ambitious targets are needed.
- 2.7 WQ TMA support the urgent review and update of the current mode shift plans for Auckland. It is critical that these plans are fit for purpose and draw from global examples in best practice in order to get the very best outcomes.

<sup>1</sup> Auckland Unitary Plan, 1214.8.2(2)(a)(ii) requires that restricted discretionary office activities in the Wynyard Quarter have to demonstrate that the activity, along with any other existing, permitted or consented activities do not exceed the following trip generation targets: 3650 vehicles per hour two way; 2500 vehicles per hour one way inbound or outbound during the weekday morning peak (7am to 9am); and 2500 vehicles per hour one way outbound or inbound during the weekday afternoon peak (4pm to 6pm).

- 2.8 WQ TMA support the Government's aspiration to speed up the road allocation to prioritise walking, cycling, public transport and micro mobility. This would include reducing regulatory and legislative barriers that can make it difficult for local Councils to implement change. This process needs to be conciliatory, taking on board the views of key stakeholders including businesses and the community in the area.
- 2.9 Electric cars are part of the solution but replacing ICE vehicles with electric will not solve many of the issues that have been created by high vehicle numbers. It will not reduce congestion. It will not encourage mode shift nor will it increase uptake of active modes, which have associated health benefits. So caution is needed in the approach to encourage ICE vehicles to be swapped for EVs.
- 2.10 Any agency tasked with driving behaviour change needs to be agile and to able to respond locally. The one size fits all approach is unlikely to be successful, or deliver the results needed. Local groups and organisations (including iwi) know what works for their communities. Use existing networks such as Business improvement districts, chamber of commerce, cycling groups, as well as groups which were utilised to increase Covid 19 vaccination rates.
- 2.11 Ensure new developments are well connected by walking and cycling paths as well as public transport. Retrofitting such options is time consuming, costly and difficult.
- 2.12 Often there is a perceived lack of public transport rather than an actual lack of options.
  More needs to be to promote travel options. Access to information on travel options easy and transparent. People need incentives to change entrenched behaviours.
- 2.13 WQ TMA are keen to see more EV car share schemes being given priority over public car parking as well as the installation of more EV charging infrastructure.

### 3. Suggestions for consideration

- 3.1 Urgently progress mass rapid transport solutions for our biggest cities. Funding needs to be allocated now for such projects. Government priority needs to be given to the projects which will move the largest number of people, in our biggest cities.
- 3.2 Deliver an app-based integrated ticketing solution for public transport travel moving away from each city having their own individual card-based schemes. This will reduce a potential barrier to using public transport.
- 3.3 Enable the introduction of Congestion charging in major urban areas and at the same time introducing better public transport options and incentives to use active modes.
- 3.4 Remove the Fringe Benefit Tax (FBT) system that penalises employers who provide subsidised sustainable mode options to their staff. These outdated taxation rules need to be removed as soon as possible. This change will, for example encourage businesses to offer subsidized public transport to their staff.
- 3.5 Look at the possible introduction of a Workplace Parking levy. This scheme charges employers who provide workplace car parking and is a "congestion charging lever". This has been successfully trialled by <a href="Nottingham City Council">Nottingham City Council</a> in the UK. This could be piloted in

congested areas, where public transport options are good. At the present time staff can be actively encouraged to drive to work by the free onsite car parking spaces provide by their employers.

- 3.7 WQ TMA support the concept of reducing public transport fares particularly at off peak times. This will help spread the load, as well as encouraging new PT users. Those who have no option but to travel by car should not be adversely disadvantaged by any new measures.
- 3.8 If free public transport is to be introduced, consider including not only community service card holders, but also essential workers such as police, teachers, nurses etc.
- 3.8 Look to introduce and support bikes and micro-mobility options at hubs of employment, education and public transport, in key locations to facilitate sustainable modes for the first/last mile travel.
- 3.9 WQ TMA would like to see comprehensive, free applications for all businesses wanting to track their carbon emissions reduction progress. The app need to cover all aspects of emission reductions opportunities including changes in commuter behaviour. This will ensure inclusivity.
- 3.10 Use existing networks and stakeholder groups to drive change. A place-based approach should be used. These bodies and organisations know and understand their communities and will get good traction and results, if the right approach is adopted.
- 3.11 WQ TMA support Light Rail being a connected route right through to Wynyard Quarter. This needs to be fast tracked in terms of both planning and funding.
- 3.12 WQ TMA would like to see more monitoring devices so that changes in modes can be monitored and tracked. These would include counting cyclists, pedestrian, scooter riders, as well as the occupancy and type of vehicles. Accurate monitoring will give accurate results.
- 3.13 Increasing usage of active modes will require an increased provision of end of trip facilities. This should include secure areas for the safe storage of bikes and micro mobility, as well as lockers and water fountains.
- 3.14 Being inclusive means including everyone. Supporting community-based projects should mean that everyone can have access to loan bikes, bike training, EV's etc, no one should be excluded. Trials can be established to pilot and test locations and monitor success.

#### 4. Conclusion

WQ TMA recognise the importance of the Emissions Reduction Plan and acknowledges that all businesses and communities have a part to play. A key factor to success is bringing people along on the journey and having a mix of "carrot and stick" policies that are both inclusive and realistic.